

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of )

Policy and Rules Concerning the )  
Interstate, Interexchange Marketplace )

CC Docket No. 96-61

Implementation of Section 254(g) of the )  
Communications Act of 1934, as amended )

DOCKET FILE COPY ORIGINAL

**U S WEST, INC. REPLY COMMENTS**

I. **INTRODUCTION**

U S WEST, Inc. ("U S WEST"), hereby responds to the second round of comments<sup>1</sup> filed in the above-referenced docket, concerning the Federal Communications Commission's ("Commission") proposals to implement a

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<sup>1</sup> Comments referenced herein, filed Apr. 25, 1996 are: Ad Hoc Telecommunications Users Committee, et al. ("Ad Hoc"); America's Carriers Telecommunication Association ("ACTA"); The Association for the Study of Afro-American Life and History, Inc. ("Afro-American History"); AT&T Corp. ("AT&T"); Cable & Wireless ("C&W"); Chrysler Minority Dealers Association ("Chrysler"); Citizens for a Sound Economy Foundation ("CSE Foundation"); Compaq Computer Corporation ("Compaq"); Competitive Telecommunications Association ("CompTel"); Consumer Electronics Retailers Coalition ("Consumer Electronics"); Excel Telecommunications, Inc. ("Excel"); GTE Service Corporation ("GTE"); LCI International Telecom Corp. ("LCI"); WorldCom, Inc. d/b/a LDDS WorldCom ("LDDS"); MCI Telecommunications Corporation ("MCI"); National Association of Development Organizations, et al. ("NADO"); National Bar Association ("NBA"); National Black Data Processors Association ("NBDPA"); The NYNEX Telephone Companies ("NYNEX"); SBC Communications, Inc. ("SBC"); Sprint Corporation ("Sprint"); Telecommunications Resellers Association ("TRA"); United States Telephone Association ("USTA") and U S WEST.

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mandatory detariffing regime and allow bundling of customer premises equipment (“CPE”) and transmission services.<sup>2</sup> The comments in this proceeding clearly support the positions articulated by U S WEST in its initial comments. Namely, that the Commission should: 1) adopt a permissive detariffing policy,<sup>3</sup> and 2) permit bundling of CPE and transmission services, *provided* the underlying transmission service is also offered on an unbundled basis.<sup>4</sup> U S WEST limits these reply comments to issues raised in the NPRM and related comments which are key to promoting competition in the interstate, interexchange market.

## II. REGIONAL BELL OPERATING COMPANIES (“RBOC”) SHOULD BE SUBJECT TO THE SAME RULES AS THEIR COMPETITORS

Like U S WEST, a number of parties (representing a variety of interests) recognize the importance of allowing RBOCs to compete as new entrants in the interstate, interexchange market<sup>5</sup> without being subject to regulations not applicable to all other competitors.<sup>6</sup> A few Commenters, however, seek to advance the stale claim that safeguards must be in place to prevent the horrors RBOCs can

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<sup>2</sup> In the Matter of Policy and Rules Concerning the Interstate, Interexchange Marketplace, Implementation of Section 254(g) of the Communications Act of 1934, as amended, CC Docket No. 96-61, Notice of Proposed Rulemaking, FCC 96-123, rel. Mar. 25, 1996 (“NPRM”).

<sup>3</sup> See, e.g., AT&T at 5-7; C&W at 5-8; GTE at 2; LCI at 2-7.

<sup>4</sup> See, e.g., Sprint at 26-28; NYNEX at 5-7; TRA at 40-42; USTA at 3-4.

<sup>5</sup> See, e.g., NBA at 1; Chrysler; Afro-American History at 1-2; NBDPA at 2.

<sup>6</sup> See, e.g., SBC at 2; CSE Foundation at 4-5; USTA at 3; NADO at 5.

inflict with their so-called market power. The Commission should reject any such arguments which encourage an unlevel playing field and thus thwart competition.

For instance, a handful of parties advocate that RBOCs should have to file tariffs regardless of whether or not the Commission institutes a mandatory or permissive detariffing policy. CompTel, LDDS and LCI -- Commenters which generally support a permissive policy -- advocate that interexchange services provided by RBOCs must be fully tariffed, for an unspecified period of time. These Commenters spew hollow claims of RBOC unlawful cross-subsidization and discrimination in an attempt to justify disparate treatment for RBOCs.<sup>7</sup> While admitting that RBOCs lack control over the local loop outside their territories, ACTA similarly supports mandatory filing of tariffs by RBOCs because, according to ACTA, the RBOCs intend to work together to annihilate competition, with the ultimate goal of a complete merger in mind.<sup>8</sup>

An even smaller group of Commenters desires to restrict RBOCs through additional regulation to which no other carriers would be subject; they oppose RBOC bundling of CPE and transmission services. MCI and Excel believe RBOCs should be prohibited from bundling because they have the ability and incentive to behave anticompetitively.<sup>9</sup> One Commenter would even have the Commission

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<sup>7</sup> CompTel at 19; LDDS at 15-16; LCI at 10 n.9.

<sup>8</sup> ACTA at 3.

<sup>9</sup> MCI at 26-27; Excel at 5-6.

prohibit RBOC bundling until a checklist,<sup>10</sup> similar to that found in Section 271 of the Telecommunications Act of 1996,<sup>11</sup> has been met.

Such comments are nothing more than well-worn alarmist statements which were previously refuted in CC Docket No. 96-21 and in the comments and replies filed earlier in this proceeding.<sup>12</sup> As has been made evident in all of these filings, market realities and regulations to which RBOCs are currently subject make such actions by RBOCs in the interstate interexchange market quite difficult, if not impossible.

First, outside of areas where they provide local exchange services, RBOCs have no power at all to behave in a manner which impairs competition. The gigantic presence of AT&T is far more of a threat to competition than any RBOC. Even within their own region, interLATA service is a market where RBOCs, as new entrants, have no market power. Second, current regulations, such as those relating to equal access and non-discrimination safeguards, also prevent the actualization of these Commenters' fears. Antitrust rules also prohibit RBOCs from engaging in anticompetitive behavior. Commenters seem to have ignored these

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<sup>10</sup> Compaq at 4.

<sup>11</sup> Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, 86 (1996) ("1996 Act").

<sup>12</sup> See Reply Comments of U S WEST, CC Docket No. 96-21, filed Mar. 25, 1996 at 2-5; Comments of U S WEST, filed herein Apr. 19, 1996 at 7-10; Reply Comments of U S WEST, filed herein May 3, 1996 at 2-4. See also, e.g., Comments of the Florida Public Service Commission, filed herein Apr. 18, 1996 at 11-13; Comments of Pacific Telesis Group, filed herein Apr. 19, 1996 at 8-10; Comments of BellSouth Corporation, filed herein Apr. 19, 1996 at 15-17

regulations. In addition, as the Commission recognizes, by engaging in anticompetitive conduct, a carrier risks the loss of customers to its competitors,<sup>13</sup> something which could be very harmful to RBOCs as the local exchange market moves toward competition. Accordingly, there is no basis for subjecting RBOCs to an arbitrary regulatory scheme separate and apart from that imposed on their competitors. Interstate, interexchange regulations should be applied in an even-handed manner.

U S WEST additionally notes that the Commission generally relaxes regulatory burdens on new entrants to foster competition.<sup>14</sup> To require only new entrant RBOCs to file interexchange tariffs, for example, would result not only in the imposition of additional costs upon them, but could also delay their entry into the interexchange market, contrary to the Commission's procompetitive policies.

### III. A COMPETITIVELY NEUTRAL MARKET REQUIRES INTERFACE DISCLOSURE

As a final matter, U S WEST reiterates its position that common carrier interfaces should be publicly disclosed. U S WEST notes that none of the Commenters opposed placing such a condition on bundling of CPE and transmission services. In fact, like U S WEST, several parties recognize the necessity of this condition in a competitive environment.

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<sup>13</sup> See NPRM ¶ 28.

<sup>14</sup> See, e.g., In the Matter of Policy and Rules concerning rates for competitive common carrier services and facilities authorizations therefor, Notice of Inquiry and Proposed Rulemaking, 77 FCC 2d 308, 338-39 ¶ 55 (1979).

For example, NYNEX, Consumer Electronics and MCI note that proprietary technology will likely result in locking customers into a particular vendor, a concept foreign to a competitive marketplace.<sup>15</sup> Ad Hoc similarly supports such a disclosure requirement (as well as a corresponding notice period for interface changes) as essential to balancing the goals of maximizing customer choice and preserving competition in the CPE market.<sup>16</sup>

Without such a safeguard, a carrier could utilize proprietary interfaces to jeopardize competition. That is, an interexchange carrier could refuse to provide technical information necessary for manufacturers (unaffiliated with that carrier) to produce CPE compatible with that carrier's services. Consequently, competition in such a situation is essentially precluded, a result contrary to the 1996 Act and to the Commission's goals in proposing to permit bundling. Disclosure of interfaces prevents such an outcome.

#### IV. CONCLUSION

U S WEST urges the Commission to impose a uniform set of regulations. The Commission should institute a permissive tariff filing regime, and RBOCs, like all other affected carriers, should be able to take advantage of that policy. Similarly, if the Commission permits interexchange carriers to bundle CPE and transmission services, RBOCs should not be precluded from doing so. Finally, the Commission

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<sup>15</sup> NYNEX at 6-7; Consumer Electronics at 13-14; MCI at 24 n.38.

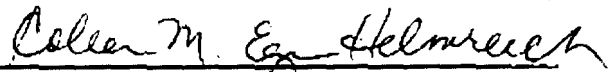
<sup>16</sup> Ad Hoc at 12-13.

should require public disclosure of interfaces under any permissive bundling policy.

Each of these actions will promote a competitive interexchange service market.

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I, Kelseau Powe, Jr., do hereby certify that on this 24th day of May, 1996, I have caused a copy of the foregoing **U S WEST, INC. REPLY COMMENTS** to be served via first-class United States Mail, postage prepaid, upon the persons listed on the attached service list.



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